REMARKS

Claims 1-14 are pending. Claims 1 and 6 have been amended. Claims 10-14 are newly presented. Reconsideration and allowance of the present application based on the following remarks are respectfully requested.

Applicant respectfully requests entry of this amendment since no new issues are raised by this response and it places the application in condition for allowance or at least in better form for appeal.

Claim Rejections Under 35 U.S.C. § 102

Claims 1, 2, 4-6, and 8 were rejected under 35 U.S.C. § 102(e) over Tong et al. (U.S. Patent No. 6,744,744). Applicants respectfully traverse this rejection.

Claim 1 recites a turbo code encoder that includes a first convolutional encoder that generates N systematic bits and N first parity bits and a second convolutional encoder that generates N second parity bits. The 3N total bits are then input into a repeater which repeatedly outputs predefined bits among the 3N total bits. In contrast, Tong teaches that data bits have a redundancy because of the FEC encoding 22 (i.e., the turbo encoders 92) and are punctured to achieve a desired rate matching. Therefore, Tong teaches that the puncture 95 deletes certain received bits to remove redundancy before the selector 97 and repetition function 96 are provided. In this manner, Tong teaches that less than the total number of bits P1 and P2 are input into the repetition function 96. Accordingly, Tong fails to teach or suggest that 3N total bits are input into a repeater which repeatedly outputs predefined bits among the 3N total bits, as recited in claim 1.

Similarly, claim 6 is believed allowable for at least the reasons presented above with respect to claim 1 because claim 6 recites, in part, repeatedly outputting predefined bits among the 3N bits output from the previous steps of the method.

Claims 2, 4, 5, and 8 are believed allowable for at least the reasons presented above with respect to claims 1 and 6 by virtue of their dependence upon claims 1 and 6.

Accordingly, Applicants respectfully request reconsideration and withdrawal of this rejection.

Claim Rejections Under 35 U.S.C. § 103

Claims 3, 7, and 9 were rejected under 35 U.S.C. § 103(a) over Tong. Applicants respectfully traverse this rejection.

Claims 3, 7, and 9 are believed allowable for at least the reasons presented above with respect to claims 1 and 6 by virtue of their dependence upon claims 1 and 6 and

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because, as discussed above, Tong fails to teach or suggest at least the subject matter of

claims 1 and 6. Accordingly, Applicants respectfully request reconsideration and withdrawal

of this rejection.

New Claims

Claims 10-14 are newly presented, fully supported by the original specification and

believed allowable over the prior art of record for at least the reasons presented above with

respect to claims 1 and 6.

Conclusion

Therefore, all objections and rejections having been addressed, it is respectfully

submitted that the present application is in a condition for allowance and a Notice to that

effect is earnestly solicited.

Should any issues remain unresolved, the Examiner is encouraged to contact the

undersigned attorney for Applicants at the telephone number indicated below in order to

expeditiously resolve any remaining issues.

Respectfully submitted,

MAYER BROWN ROWE & MAW LLP

Yoon S. Ham

Registration No. 45,307

Direct No. (202) 263-3280

YSH/VVK Intellectual Property Group

1909 K Street, N.W.

Washington, D.C. 20006-1101

(202) 263-3000 Telephone

(202) 263-3300 Facsimile

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